

# Exhibit 28:

## W.C. Declaration

**DECLARATION OF W.C.**

1. I am a current registrant on the Michigan Sex Offender Registry. I was convicted in 2005 and was released from prison in 2012. I successfully completed three years of parole in 2015. I am 67 years old and have been on the sex offender registry for over ten years. As a tier III registrant, I will be on the Michigan Sex Offender registry for the rest of my life.

2. Upon my release I was required to register with the California Sex Offender Registry for life. I permanently moved to Michigan in 2020 because I have several family members in the area and am now a Michigan resident. When I moved to Michigan, I was informed that I would be required to register with Michigan Sex Offender Registry as a tier III registrant for life.

3. My most recent job was as a sales associate for a large hardware company where I worked from May through August of 2022. When I applied for this job, no background check was completed because the business participates in the “ban the box” movement. While I worked there, I learned that at least one other person with a conviction was on staff.

4. During my time at the hardware store, I experienced open hostility. In one instance, someone called into the store while I was on shift and taking calls. When I answered the call, the caller complained that a “violent rapist” worked at the store. The caller shared personal information about me, including my work and home

address, and demanded I be removed. At one point, he said he was going to “get that guy.” My assistant manager at the time was around but not on the call, and I did not tell him about it. But the next time I worked with my assistant manager following the call, he began asking me similar questions to the ones the caller had asked.

5. Not long thereafter I was terminated from my job at the hardware store. At the beginning of my last shift, I was called into the assistant manager’s office, with an HR representative and the general manager. They told me someone had looked me up online, found my registration status, and sent it to them. They terminated me on the spot, stating I was causing a disruption in the workplace, though they never said what the disruption was. There were never any other complaints about me or my work ethic.

6. Before working for the hardware store, I struggled finding work despite holding a Master’s in Fine Arts I earned from Colombia College in Chicago in 1992 (though my thesis was not officially approved until 2021). Since moving to Michigan, I’ve worked at odd jobs and low-paying jobs including Goodwill for less than \$10/hour with a 50-mile commute, and two factory-furniture stores where safety standards were poor and employees suffered repeated injuries.

7. The inability to find and keep stable employment, on top of being on the registry, has made it difficult to keep housing. I am currently in a committed relationship with a woman I’ve known since I was 14 years old, but we do not live

together. I cannot live with any of my family or friends because they do not want their address added to the registry. Finding housing has been difficult. I spent much of my time in California after my release homeless before leaving for Michigan.

8. Here in Michigan, I was turned down for housing repeatedly. On a few occasions, I'd gotten far enough into the application process to put down a deposit, but each time the rental agent discovered my registry status and refused to rent to me. I eventually secured a place with a private owner willing to rent to me where I have lived alone since 2021. With the recent loss of my job, however, I am now facing homelessness as I will not be able to afford to keep my current place.

9. The registration process is confusing. While I know *when* I have to register, I do not know *what* I have to register. I don't know how long of a period I have to register certain information. This causes me a lot of stress because I do not want to go back to prison because I failed to register something at the appropriate time. I'm not sure what internet activity I am supposed to report; so I do not use the internet or social media very often. I want to enroll in online computer skills classes with Macomb Community College, but the registration requirements are unclear, so I have not done so. I've asked law enforcement and state police about what I am supposed to report, but they generally can't or won't answer specific questions, or they refer me to someone else.

10. The confusion has made it impossible for me to travel. I have close friends in other states who have asked me to visit. However, I would need to fulfil registry requirements in Michigan and any state I visit. I do not feel that I can visit these places long enough to justify the travel expense and stress.

11. I have dealt with numerous instances of harassment due to my registration status. I suffer from both PTSD and depression—for which I am currently in treatment—because of stress and paranoia around accidentally violating my registration requirements or being harassed by people who have looked me up. I am afraid of making new friends because if people look me up, they will ostracize me, and I don't know how to handle that. Anyone who googles my name instantly becomes aware of my registration status.

12. I recently found out from my physician and cardiologist that, despite a lifetime of good health, I have an irregular heartbeat most likely brought on by stress. The most stressful part of my life is being on the sex offender registry, trying to remain compliant despite the confusing requirements, and the inability to lead a normal life while my name is remains on the registry.

I, W.C. certify under penalty of perjury that the above statement is true and correct pursuant to 28 U.S.C. § 1746.

W.C.  
(name on file with Plaintiffs' counsel)

Dated: March 19, 2023